

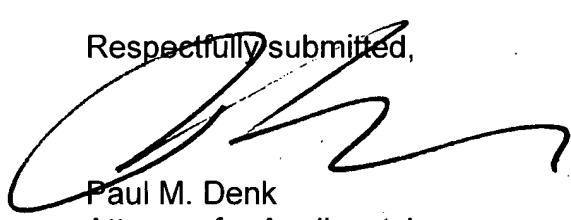
REMARKS

The claims of this application have been substantially amended, so as to define the structure of Applicants' device, which includes particularly shaped components that add to the precision of operations of the modular robotic device of this invention. Claim 28, newly added, defines the structure of Applicants' invention, in particular, as the examiner can note, the modular unit of Applicants' device can be formed from the series of extruded types of structural members, such as shown at 3, in FIG. 1a, in addition to number 23, in FIG. 1, as forming at least one or a pair of guide members, formed of such structural members, to add further precision when such unit incorporates a plate, as at 21, as also shown in FIG. 1. The Crockett patent just does not show that type of structure for its picker, as can be noted. Crockett may show a cylinder 23, within its particular device, in addition to a cylinder 35, for providing movement in a different direction, but the structure of the modular units themselves, as claimed by Applicants', which incorporates formed modular units, having a structural member, slide rail partially mounted therein, and a slide provided for slidingly connecting for movement upon the slide rail, as submitted, is just not shown or described, in any manner, in Crockett. Hence, it is just not seen how Crockett can be used to provide any suggestion, to construct the claimed subject matter of newly added claim 28, et al, for this invention. Obviousness, as the examiner knows, can not be established by combing teaching of the prior art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting that combination. See the case of *In re Geiger*, 815 fed. 2nd 686 (Fed. Cert. 1987). It is submitted that Crockett just does not show any type of answering structure with which it can be used, to provide formation of the type of modular robotic system as now claimed by Applicants', in the amended claims.

In addition, the examiner further cites Crockett, as providing a basis for obviousness rejection, and further cites Nagai, in view of Loock, for making Applicants' invention obvious. As previously reviewed, Nagai does not appear to include any type of a slide rail, on a structure, in the first instance, and which slide rail has a series of slides matingly mounted thereon, as claimed for the current invention. This is all related to the type of structure as now defined in newly added claim 28. Hence, it is just not seen how Loock, with its element 6, can in any way modify Nagai, to provide structure in any manner similar at to what is set forth in claim 28, et al, for the current invention. Nagai's element 6 appears to be some type of spaced apart jaws, which really have no relevancy to the type of structure as defined and claimed for the current invention. Hence, it is not seen how these element 6, of Loock, can somehow be embodied into Nagai, to provide answering structure. If Nagai's elements 6 are intended to be equivalent to some type of a rake, recognize that claim 28, as newly added, furnishes far more precise type of particular structure for use in fabricating this modular robotic system, for holding and cooperating as any rake, tray, or gripper, as in Applicants' invention, since it includes the type of machine part being processed by the system of Applicants' unit. Hence, it can just not be seen how obviousness can be derived from Loock, in view of Nagai, notwithstanding the fact that Crockett provide the use of a couple of cylinders, for moving its element 40 in a pair of directions. Applicants' claims are far more detailed in defining the precision from the structure that it integrates together to form their modular systems, and which can be built, one upon the other, to furnish multiple directions of precision movement, for any part to be work, or any tray or gripper that may be moved therewith, during usage of this modular system.

The examiner's further review of the claims of this application would be appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "PAUL M. DENK".

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